

**Response 44**

The New-Indy facility operates a TRS scrubber. The only gas component going to the TRS scrubber is the low volume high concentration component (LVHC) of the non-condensable gas system. The TRS scrubber is a packed column used to contact the LVHC gases with caustic to remove ionizable TRS compounds.

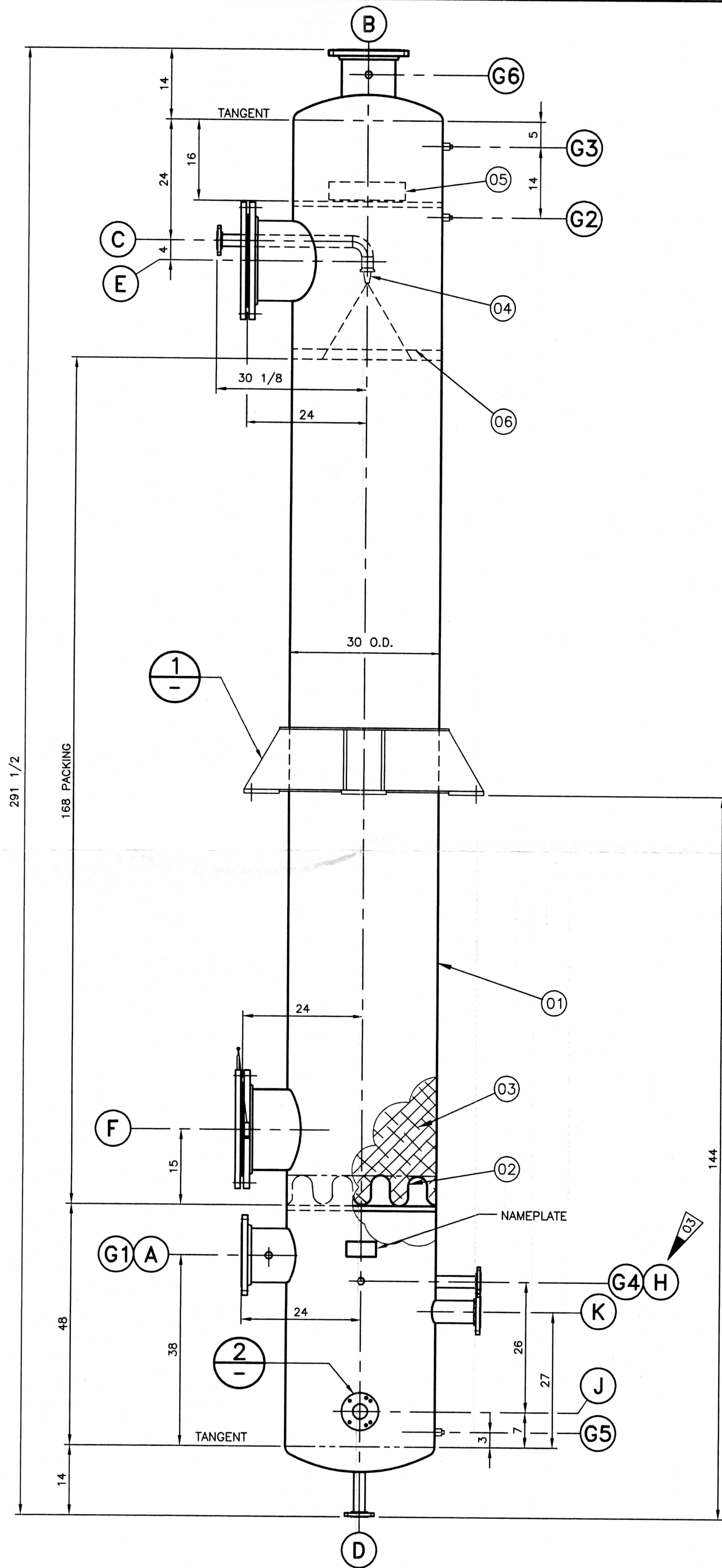
In operation, scrubbing liquid enters the column through a nozzle and is sprayed uniformly across the top of a packed bed so that it trickles evenly through the packing material from top to bottom without channeling. LVHC Gas enters the column through the inlet near the bottom and passes through the support plate into the packed bed, counter current to the flow of the scrubbing liquid, contaminants are removed. After passing through the packed bed, the cleaned gas passes through a mist eliminator section near the top of the tower. Here, any entrained liquid is removed before the clean air is discharged through the outlet. The scrubbing liquid is recirculated from the bottom of the scrubber to the top using a pump and control valve. Recirculation flow of the scrubbing liquid is measured and controlled. pH of the scrubbing liquid is also monitored and caustic is added to the recirculation to maintain a specified pH. Spent scrubbing liquid is sent back to the process for sulfur recovery.

Pursuant to New-Indy's Title V permit, it continuously monitors liquid recirculation flow and pH of the scrubbing liquid. Operational ranges for the monitored parameters have been established to indicate proper operation of the control devices. These operational ranges for the monitored parameters were derived from stack test data and/or vendor certification, which demonstrate the proper operation of the equipment in compliance. The values are as follows:

Scrubber recirculation  $\geq 30$  gpm

Scrubber pH  $\geq 10$

An equipment drawing and P&ID is attached.

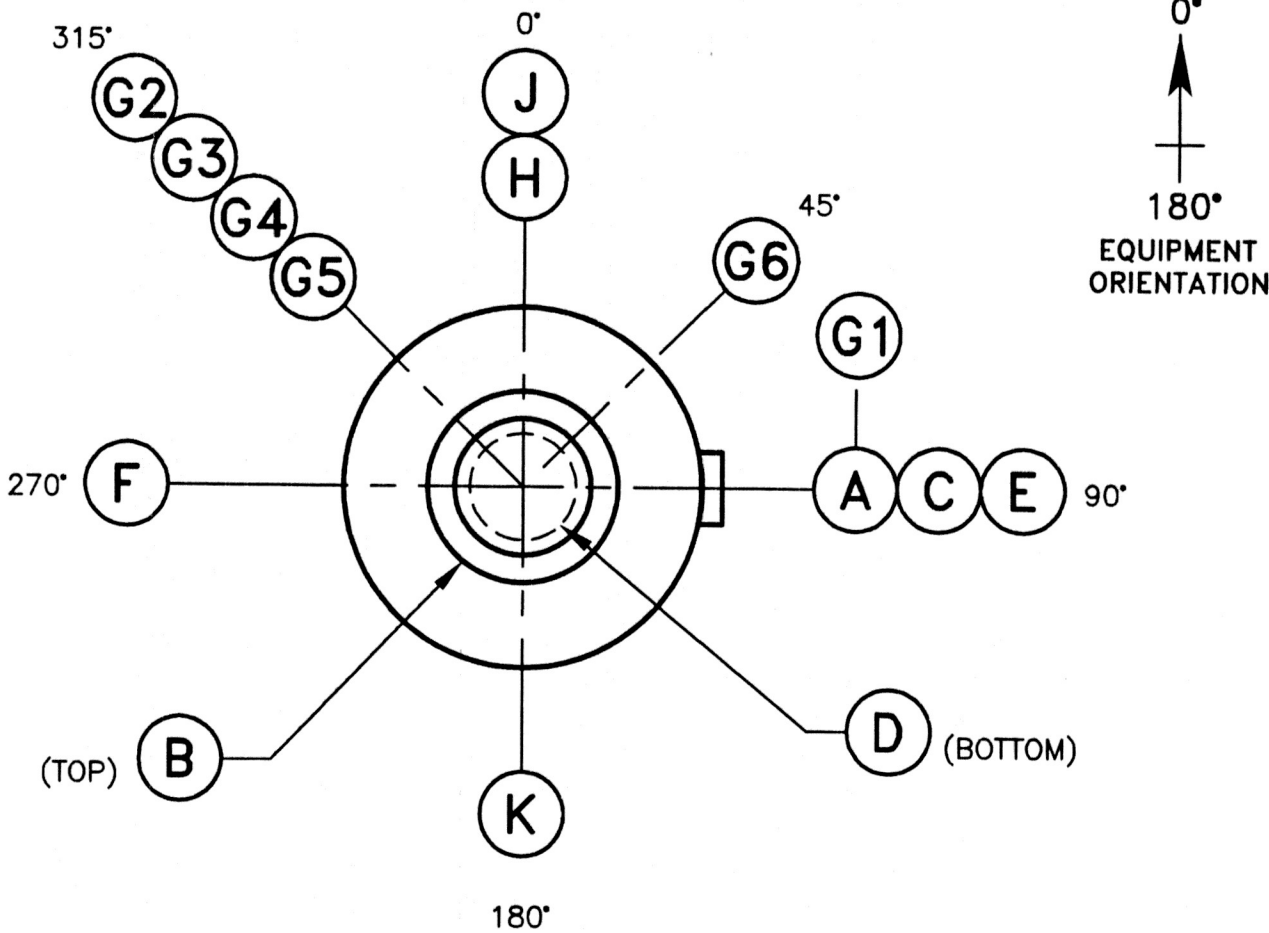


ELEVATION

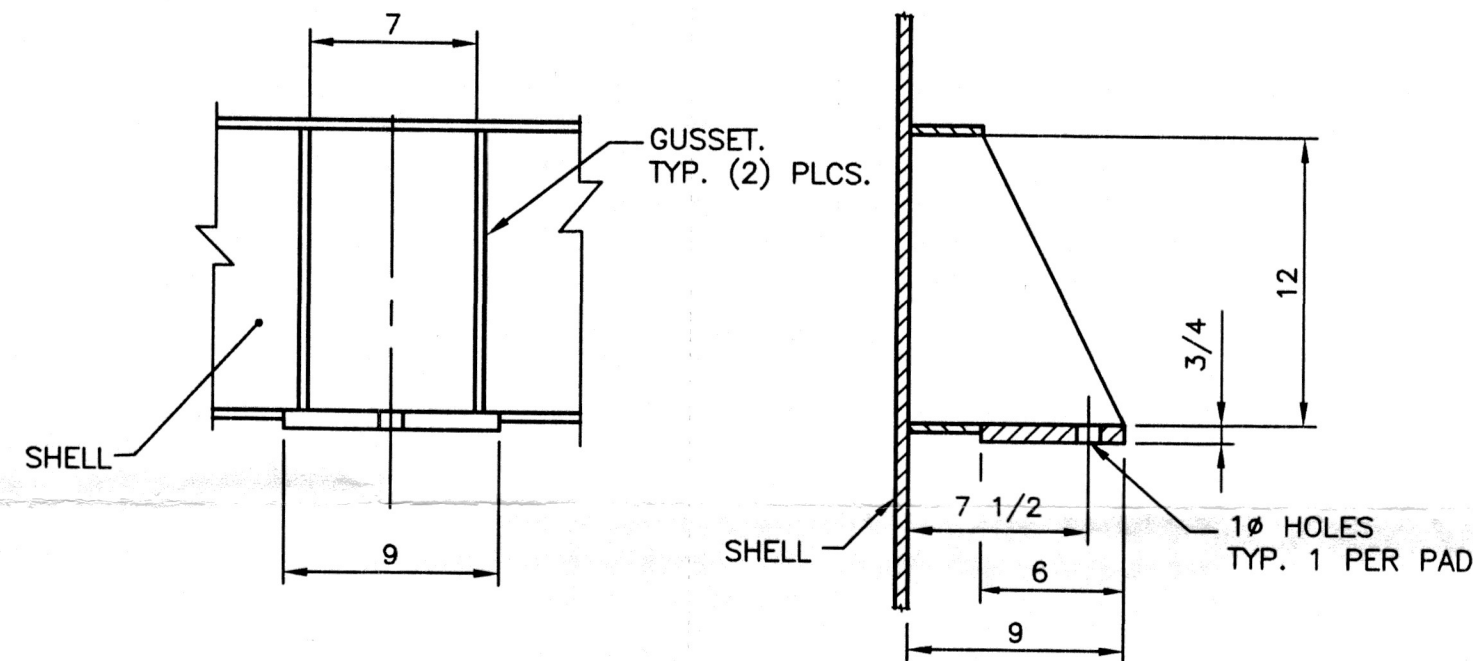
NOTE: NOZZLES NOT SHOWN IN TRUE ORIENTATION.

FABRICATION DETAILS	
DESCRIPTION	AL-007010
REFERENCE	DRAWING NO.

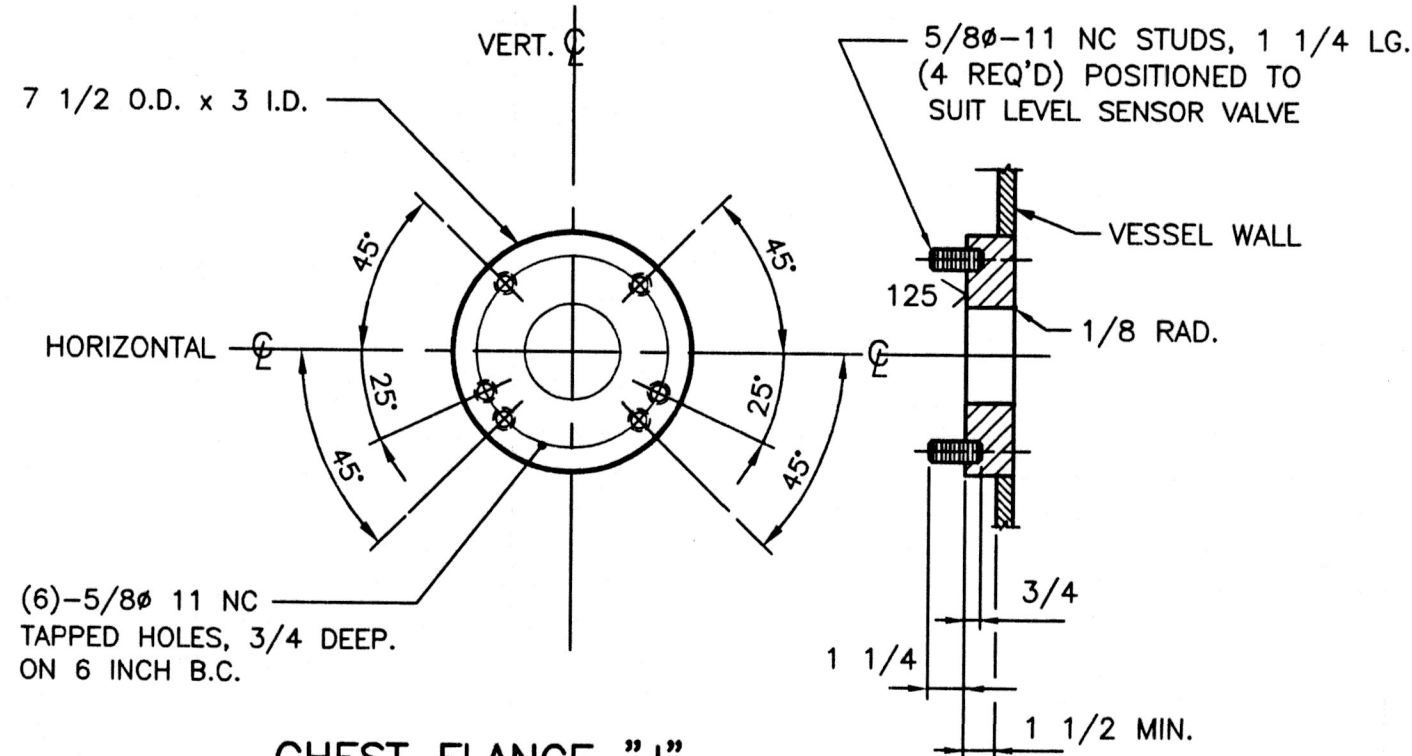
THIS DRAWING IS THE PROPERTY OF A.H. LUNDBERG ASSOCIATES AND IS TO BE RETURNED UPON REQUEST. IT IS LOANED UPON CONDITION THAT IT WILL NOT BE REPRODUCED IN WHOLE OR IN PART, OR USED TO FURNISH INFORMATION TO OTHERS, OR FOR ANY PURPOSE OTHER THAN WORK AUTHORIZED BY A.H. LUNDBERG ASSOCIATES.



NOZZLE ORIENTATIONS



SUPPORT PAD  
LOCATE AT 0°, 90°, 180°, 270°. TYPICAL 4 PLACES  
1 - DETAIL  
SCALE: 1 1/2" = 1'-0"



CHEST FLANGE "J"  
2 - DETAIL  
NTS

03	REVISED NOZZLE "H" TO 2" RFSO.	MG	6/19/00	AEP	4/19/00
02	REVISED NOZZLE ORIENTATION, REMOVED HOLD.	MG	5/15/00	AEP	5/15/00
01	ADDED OVERFLOW NOZZLE "K", CHANGED NOZZLES "C" & "D", REVISED LRB MATERIAL AND NOTES 2, 4 & 8.	MG	2/18/00	AEP	2/23/00

REV.	DESCRIPTION	BY	DATE	CHK	DATE	REV.	DESCRIPTION	BY	DATE	CHK	DATE

NOZZLE SCHEDULE

NOZ	SIZE	QTY	RATING	TYPE	DESCRIPTION
A	10	1	150 LB.	LRBF	VAPOR INLET
B	10	1	150 LB.	LRBF	VAPOR OUTLET
C	2	1	150 LB.	LRBF	LIQUID INLET
D	2	1	150 LB.	LRBF	LIQUID OUTLET
E	16	1	SPECIAL	BOLTED	MANWAY (INCLUDES NOZZ. C)
F	16	1	SPECIAL	BOLTED	MANWAY W/DAVIT RT.
G	3/4	6	3000 LB.	FULL CPLG.	INSTRUMENT CONN. W/ PLUG
H	2	1	150 LB.	RFSO	LEVEL CONNECTION
J	3	1	150 LB.	SPECIAL	LEVEL CONNECTION
K	4	1	150 LB.	LRBF	OVERFLOW

LRBF = LOOSE RING BACKING FLANGE, CARBON STEEL, GALVANIZED  
RFSO = RISED FACE BACKING FLANGE

DESIGN DATA


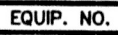
SPECIFICATION		SHELL SIDE
STAMPING	CODE (LATEST EDITION)	NOT REQ'D.
OPERATING	DESIGN	120° F
OPERATING	DESIGN	300° F
OPERATING	DESIGN	-0.5 PSIG
OPERATING	DESIGN	15 PSIG TO FULL VACUUM
OPERATING	DESIGN	23 PSIG
CORR. ALLOW.	STRESS RELIEF	NONE
RADIOGRAPH	JOINT EFFICIENCY	A/R
JOINT EFFICIENCY		70% MIN.

NOTES:

- ALL DIMENSIONS ARE IN INCHES.
- MATERIAL: SHELL AND NOZZLES = T-316L S.S.  
INTERNAL = T-316L S.S.  
SUPPORTS = T-316L S.S.  
GASKETS = GARLOCK FAWN GYLON.
- STANDARD FLANGED NOZZLE PROJECTION TO FACE OF FLANGE IS 9" UNLESS NOTED OTHERWISE.
- DELETED
- ALL OPENINGS AND NOZZLES PROTECTED FOR SHIPMENT.
- SUPPLIED BY A.H.L. ASSOC. FOR FIELD INSTALLATION.
- ESTIMATED WEIGHTS: EMPTY = 4,650 LBS.  
FLOODED = 12,100 LBS.
- TAGGED AS FOLLOWS:  
TRS SCRUBBER  
BOWATER EQUIP. No.: M26-0194

CERTIFIED  
JUN 21 2000

06	1	BED LIMITER	T-316 SS
05	1	MIST ELIMINATOR	T-316 SS
04	1	SPRAY NOZZLE	T-316 SS
03	69 ft <sup>3</sup>	PACKING	T-316 SS
02	1	PACKING SUPPORT PLATE	T-316 SS
01	1	SCRUBBER	T-316 SS

BOWATER INCORPORATED						
CATAWBA, SOUTH CAROLINA						
P.O. No. SV-150-816JP						
DWN. BY	A.T.		A.H. LUNDBERG ASSOCIATES, INC.			
DATE:	01/17/00		P.O. Box 597 Bellevue, Washington 98009			
CHK. BY	DMD	TRS SCRUBBER DIMENSION DRAWING				
DATE:	1/27/00					
APP. BY	AEP	SCALE:	EQUIP. NO.	DRAWING NO.	SHT.	REV.
DATE:	1/28/00	3/4"=1'-0" OR NOTED		AL-995326-04	1/1	03

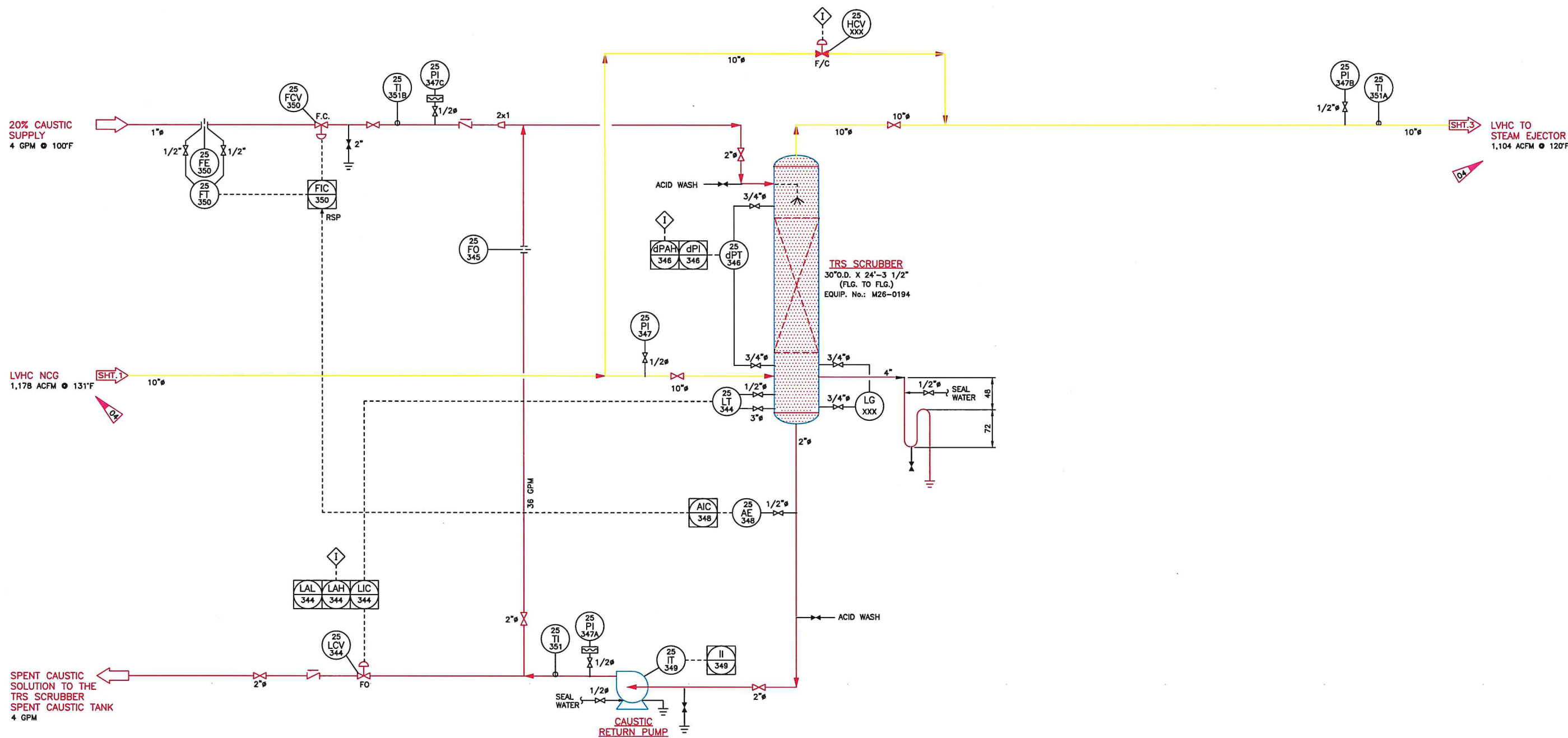


AL-995326-P1

SHT. 2 / 3

AL-995326-01

SPEC. ODOR 0.10



ITEM	NO.	DESCRIPTION	MAT'L	REFERENCE
BOWATER INCORPORATED CATAWBA, SOUTH CAROLINA P.O. No. SV-150-816JP				
A.H. LUNDBERG ASSOCIATES, INC. P.O. Box 597 Bellevue, Washington 98009				
NCG COLLECTION SYSTEM FLOW DIAGRAM				
SCALE:	EQUIP. NO.	DRAWING NO.	SHT.	REV.
NONE		AL-995326-01	2	04

03	BY-PASS AROUND SCRUBBER, CHANGED TO AUTO ON/OFF CONTROL VALVE.	AW	8/10/00	AEP	8/16/00
02	ADDED BOWATER TAG NUMBERS.	MG	4/13/00	AEP	4/14/00
01	REVISED PER P&ID REVIEW MTG. AND BE&K COMMENTS	MG	2/10/00	AEP	2/11/00

04	REVISED NCG FLOW AND TEMPERATURE.	EH	11/13/00		
----	-----------------------------------	----	----------	--	--

THIS DRAWING IS THE PROPERTY OF A.H. LUNDBERG ASSOCIATES AND IS TO BE RETURNED UPON REQUEST. IT IS LOANED UPON CONDITION THAT IT WILL NOT BE REPRODUCED IN WHOLE OR IN PART, OR USED TO FURNISH INFORMATION TO OTHERS, OR FOR ANY PURPOSE OTHER THAN WORK AUTHORIZED BY A.H. LUNDBERG ASSOCIATES.